



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0028 Reimbursement of experts and candidates through AGM

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)**1.1 GENERAL INFORMATION**

| | |
|---|--|
| Record reference | DPR-ELA-2023-0028 |
| Title of the processing operation | Reimbursement of experts and candidates through AGM |
| Controller entity | European Labour Authority, Resources Unit, Human Resources Sector |
| Joint controllers | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below |
| Processor(s) | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below |
| Internal organisation(s)/entity(ies) Names and contact details | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES |
| External organisation(s)/entity(ies) Names and contact details | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES |
| Data Protection Officer Name and contact details | Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu |
| Corporate Record | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Language of the record | English |
| Record Model | <input checked="" type="checkbox"/> N/A |

¹ Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1 Purpose

The European Labour Authority aims to organise meetings and manage the reimbursement of expenses incurred by participants and experts invited by the Authority through a specific tool: [Advanced Gateway to your Meetings](#) (AGM) owned by the European Commission, Administration and Payment of Individual Entitlements (PMO).

1.2.2 Processing for further purposes

- Archiving in the public interest
- Scientific or historical research purposes
- Statistical purposes
- N/A

1.2.3 Modes of processing

1. Automated processing (Article 24)
 - a. Computer/machine
 - i. automated individual decision-making , including profiling
 - ii. Online form/feedback
 - iii. Any other, specify
AGM (Advanced Gateway to your Meetings) covers most of the processes involved in organising a meeting:
 - through a Front Office where the experts (external persons) manage the invitations to meetings (including user consent to data processing) and encode their expenses claims for costs incurred when attending a meeting organised by the Authority. The Front Office is also used by correspondents (external users) who settle the list of attendants to meetings.
 - through a Back Office managed by the service organising the meeting and all the practical arrangements for the meeting (invitation and registration of participants);
 - and through a Back Office managed by the [PMO](#) for the validation of participants' bank accounts and legal entities, before reimbursement of the expenses incurred by them.
2. Manual processing
 - a. Word documents
 - b. Excel sheet
 - c. Any other, specify
3. Any other mode, specify
Speedwell for the final reimbursement of the experts/candidates. Speedweel is covered by Record "DPR-ELA-2023-0013 Speedwell".

1.2.4 Storage medium

1. Paper
2. Electronic
 - a. Digital (MS documents (Word, excel, Powerpoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
 - b. Databases
 - c. Servers
 - d. Cloud
3. External contractor premises

4. Others, specify

The European Commission, PMO servers.

1.2.5 Comments on the processing of the data

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

| | |
|-----------------------------|--|
| 1. Internal to organisation | All services staff including ELA users and the people that will be managing the invitations in external organisations (Responsible Service Admin) form HR and Finance Sector in ELA. |
| 2. External to organisation | Contact points (correspondents) in the PMO Office All the people invited and participating in a meeting (experts) |

1.3.2 Data categories/fields

Indicate the categories of data that will be processed:

- First name and surname
- Email address
- Unique identifier used by the European Commission’s Authentication Service (EU Login ID)
- Information on the transport expenses of reimbursable participants
- Information on the subsistence expenses of reimbursable participants
- The data in the legal entity form (e.g. ID document, private or professional address of the reimbursable participant, etc.). The data in the bank account form of the reimbursable participant (account number, name of account holder and any other information needed to identify the account to which payment is to be made)
- EU Login data

Through AGM it is also possible to process the first name, surname, email address, EU Login and login data of the meeting assistants in charge of organisation and the ELA’s financial officers responsible for making the reimbursements.

There is no reference in the personal data to ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation.

1.3.2.1 Special categories of personal data

Indicate if the processing operation concerns any ‘special categories of data’ which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:

Yes , the processing concerns the following special category(ies):

Data revealing

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,

Or/and,

| |
|---|
| <input type="checkbox"/> Genetic data, biometric data for the purpose of uniquely identifying a natural person, <input type="checkbox"/> Data concerning health, <input type="checkbox"/> Data concerning a natural person's sex life or sexual orientation. <input checked="" type="checkbox"/> N/A |
|---|

1.3.2.2 Data related to 'criminal convictions and offences'

| | |
|---|---|
| The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences' | N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> |
|---|---|

1.4 RETENTION PERIOD

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

| Data category | Retention period |
|----------------------|------------------|
| Financial documents | 7 years |
| Electronic documents | 7 years |

Description

The Privacy statement is accessible to every data subject on the AGM page. The ELA meeting assistant / organiser assesses the arguments of the data subject as soon as the staff organising the meeting receives a request for rectification/blocking/erasure of data for legitimate reasons. The request will be handled within 15 working days after the reception of the request.

1.5 RECIPIENTS

| Origin of the recipients of the data | |
|--|---|
| 1. <input checked="" type="checkbox"/> Within the EU organization | ELA HR Sector ELA Finance Sector |
| 2. <input checked="" type="checkbox"/> Outside the EU organization | Correspondents in the European Commission (PMO) |

| Categories of the data recipients |
|--|
| 1. <input checked="" type="checkbox"/> A natural or legal person |
| 2. <input checked="" type="checkbox"/> Public authority |
| 3. <input checked="" type="checkbox"/> Agency |
| 4. <input type="checkbox"/> Any other third party, specify |
| Specify who has access to which parts of the data: |

Description

Staff from the HR or Finance Sector in ELA on a need to know basis.

PMO staff assigned to execute tasks in the system based on the need to know principle, acting as correspondents.

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and authorised for this staff according to the 'need to know' principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The European Commission covers this process of personal data through the following record: "[DPR-EC-01141 Information system supporting the organization of meetings](#)"

1.6 INTERNATIONAL DATA TRANSFERS

| Transfer to third countries or international organisations of personal data |
|---|
| <p>1. Transfer outside of the EU or EEA</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> YES,</p> |
| <p>2. Transfer to international organisation(s)</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p> |
| <p>3. Derogations for specific situations (Article 50.1 (a) –(g))</p> <p><input type="checkbox"/> N /A</p> <p><input checked="" type="checkbox"/> Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply (ies).</p> |

Description

The system does not foresee any transfers of personal data of data to countries outside of EU/EEA.

Specific expert groups will include experts from outside UE/EEA who will be able to see the meeting documentation. It is the responsibility of the meeting organiser to adjust meeting documentation to Regulation (EU) 2018/1725-

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

| Rights of the data subjects |
|---|
| <p><i>Article 17 – Right of access by the data subject</i></p> <p><i>Article 18 – Right to rectification</i></p> <p><i>Article 19 – Right to erasure (right to be forgotten)</i></p> <p><i>Article 20 – Right to restriction of processing</i></p> <p><i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i></p> <p><i>Article 22 – Right to data portability</i></p> <p><i>Article 23 – Right to object</i></p> <p><i>Article 24 – Rights related to Automated individual decision-making, including profiling</i></p> |

1.7.1 Privacy statement

The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

Publication of the privacy statement

Published on website

Web location:

- ELA internal website (URL: SharePoint on Personal Data protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify

Privacy Statement will be sent by email with the invitation letter.

Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Description:

[Your data protection rights at ELA.](#)

1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

Description:

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Labour Authority or of its contractors.

The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation.

In order to protect personal data, the European Labour Authority has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.